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June 23, 1999

Magalie Roman Salas, Secretary
Federal Communicating Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

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RE: Reply Comments

Dear Ms. Salas:

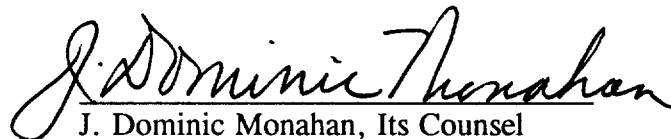
Enclosed for filing are an original and three copies of the Reply Comments of Bethesda Christian Broadcasting, Inc.

An extra copy of this transmittal letter is enclosed, as well as a pre-addressed, stamped envelope. Please confirm your receipt of the filing of this application by date stamping the extra copy of this transmittal letter and returning it to the undersigned counsel.

Should additional information be desired, please contact the undersigned counsel.

Respectfully submitted,

BETHESDA CHRISTIAN BROADCASTING INC.


J. Dominic Monahan, Its Counsel

JDM/nlk
Enclosures

cc: Mark Pluimer, Bethesda Christian Broadcasting (w/enclosure)
Redwood Broadcasting (w/enclosure)
Ron Franscell (w/enclosure)
Kevin Clements (w/enclosure)
Thomas Hutton (w/enclosure)
Gammon & Grange (w/enclosure)

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of
Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Station
Wright, Wyoming

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MM Docket No. 98-88
RM 9285, 9654

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REPLY COMMENTS

Bethesda Christian Broadcasting, Inc. ("Bethesda"), through its counsel, hereby replies to the Petition for Rulemaking filed by Mount Rushmore Broadcasting, Inc. ("Rushmore") dated July 31, 1998. Therein, Rushmore sought to amend the FM table of allotments to assign Channel 268A to Wright, Wyoming as a substitute channel for Channel 268C proposed earlier by Mountain Tower Broadcasting ("Mountain Tower"). Via *Public Notice* (Report No. 2336), issued June 9, 1999, the Commission has treated the Rushmore rulemaking as a counterproposal to the proposal of Mountain Tower to allot Channel 268C to Wright, Wyoming as that community's first local aural transmission service.

Bethesda, the licensee of Radio Station KLMP(FM), Rapid City, South Dakota, supports the proposal to add a first allocation to Wright, Wyoming. While Bethesda believes that Wright, a community of some 1,236 persons, warrants its own station, Bethesda also agrees with Rushmore that a Class A facility is the most appropriate class of frequency to be assigned for such a small community. Thus, Bethesda endorses the Rushmore proposal that a channel be assigned to Wright, Wyoming. However, for reasons set forth below,

Bethesda proposes that instead of allocating Channel 268A to Wright that Channel 258A be substituted therefor.

Bethesda's request that Channel 258A be allocated to Wright instead of Channel 268A is based on Bethesda's desire to upgrade Station KLMP(FM) from a C-1 operation on Channel 250C-1 to a full Class C operating on Channel 250. Bethesda seeks to upgrade the operation of KLMP(FM) to a full C operation in order to enable Station KLMP to provide increased radio service to the Rapid City, South Dakota community.

If upgraded, Bethesda, through this pleading, confirms its intention and willingness to implement the full C upgrade by constructing a new KLMP transmitter site on top of Terry Peak which will maximize the coverage achievable by a full 100 Kw Class C operation. This proposal will also allow Station KLMP(FM) to diplex its operation into the antenna of Station KSLT, Spearfish, South Dakota, which will operate from the same location. (Station KSLT is also owned by Bethesda.) From this location and height, Station KLMP(FM) will be able to provide 3.16 mV/m city grade coverage to all of the Rapid City city limits; currently an ability which is denied this station from its present location as a C-1 facility.

The proposed operation of Station KLMP(FM) from the Terry Peak site as a full C facility on Channel 250C is presently short spaced to Channel 249A¹, currently allocated to Gillette, Wyoming. It also conflicts with Rushmore's proposed use of Channel 268A in

¹A filing window was opened for this frequency on August 11, 1997 for the channel. Three mutually exclusive applicants filed for that facility at three different transmitter sites. These applicants include Redwood Broadcasting, Inc., Ron Franscell and Kevin Clements. These mutually exclusive applications are scheduled for auction on September 28, 1999.

Wright, Wyoming.

Bethesda proposes to substitute Channel 282A (104.3 mHz) for Channel 249A at Gillette, Wyoming. This channel will work as a fully spaced facility at all three of the sites proposed by the above referenced applications. Moreover this channel change would eliminate the short spacing to KLMP's proposal to upgrade to a full Class C facility on Channel 250.

As noted above, Rushmore has proposed Channel 268A as an alternative to Tower Mountain's proposed use of Channel 268C at Wright, Wyoming. In order to accommodate Tower Mountain's desire to bring first service to Wright as well as Rushmore's proposal for a Class A assignment, Bethesda proposes to substitute Channel 258A (99.5 mHz) fir Channel 268. This allocation will meet all spacing requirements from the reference coordinates at Wright, Wyoming.

The attached engineering report, prepared by the firm of Munn-Reese, Inc., Bethesda's consultant, establishes that the proposed channel 250C can be allotted to Rapid City, South Dakota while accommodating Class A allocations to Gillette and Wright, Wyoming in full compliance with all of the Commission's rules and regulations. Furthermore, the proposed amendments will accomplish the following goals in favor of the public interest:

1. Increased service to Rapid City, South Dakota though a Class C license issued to KLMP(FM); and
2. The assurance that both Gillette, Wyoming and Wright, Wyoming will

maintain their channel allocations free from any interference while allowing new and additional service to be introduced to these communities.

Accordingly, Bethesda requests that the Commission amend §73.202(b) of its rules to specify the table of allotments as follows:

<u>CITY</u>	<u>EXISTING</u>	<u>PROPOSED</u>
Rapid City, SD	222C, 230C1, <u>250C1</u> , 254C1, 262C1, 281C1, 292C	222C, 230C1, <u>250C</u> , 254C1, 262C1, 281C1, 292C
Gillette, WY	245C1, <u>249A</u> , 264C1	245C1, 264C1, <u>282A</u>
Wright, WY	---	<u>258A</u>

Respectfully submitted,

BETHESDA CHRISTIAN BROADCASTING INC.


J. Dominic Monahan, Its Counsel

June 23, 1999
Luvaas, Cobb, Richards & Fraser, P.C.
777 High Street, Suite 300
Eugene, OR 97401
Telephone: (541) 484-9292

CERTIFICATE OF SERVICE

I, Nancy Lee Kemper, a secretary in the law offices of Luvaas, Cobb, Richards & Fraser, P.C., certify that I have on this 23rd day of June, 1999 sent by United States mail, postage prepaid, on behalf of Bethesda Christian Broadcasting, Inc., copies of the foregoing "Reply Comments" to:

Redwood Broadcasting, Inc.
PO Box 3463
Carefree, AZ 85377

Ron Franscell
1001 Clarion Drive
Gillette, WY 82718

Kevin Clements
33 East Cedar
Chicago, IL 60611

Thomas J. Hutton
Holland & Knight LLP
2100 Pennsylvania Avenue NW, Suite 400
Washington DC 20037-3202
Counsel to Mt. Rushmore Broadcasting, inc.

Gammon & Grange
8280 Greensboro Drive
7th Floor
McLean, VA 22102-3807
Counsel to Mountain Tower Broadcasting



Nancy Lee Kemper

ENGINEERING REPORT

**In Support Of A
Petition for Rulemaking
To Make Changes To
47 C.F.R. §73.202(b)**

**Channel 250C for Channel 250C1 – Rapid City, SD
Channel 282A for Channel 249A – Gillette, WY
Channel 258A for Channel 251A – Wright, WY**

June 1999

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MUNN-REESE, INC.

Broadcast Engineering Consultants
Coldwater, MI 49036

TABLE OF CONTENTS

1. Certification of Engineer
2. Discussion of Report
3. Figure 1 - Tabulation of Allocation for Channel 250C for KLMP at Rapid City, SD at Special Reference Point
4. Figure 2 - Topographical Map Showing Location of Special Reference Point for Channel 250C
5. Figure 3 - Map Showing City Coverage from Special Reference Point Channel 250C at Rapid City, SD
6. Figure 4 - Tabulation of Allocation Spacing from Reference Point for Channel 282A at Gillette, WY
7. Figure 4A - Tabulation of Allocation Spacings from Kevin Clements Site for Channel 282A at Gillette, WY
8. Figure 4B - Tabulation of Allocation Spacings from Ron Franscell Site for Channel 282A at Gillette, WY
9. Figure 4C - Tabulation of Allocation Spacings from Redwood Broadcasting, Inc Site for Channel 282A at Gillette, WY
10. Figure 5 - Tabulation of Allocation Spacings from Mount Rushmore Broadcasting, Inc. Reference Point for Channel 258A at Wright, WY

CERTIFICATION OF ENGINEER

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

This report has been prepared by properly trained electronics specialists, under the direction of the undersigned, whose qualifications are a matter of record before the Federal Communications Commission.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed to be accurate, errors or omissions in the database and file data are possible. This firm cannot be held liable for damages as a result of those data errors or omissions.

I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

June 16, 1999

MUNN-REESE, INC.

By Wayne S. Reese
Wayne S. Reese, President

100 Airport Drive, P. O. Box 220
Coldwater, Michigan 49036

Telephone: (517) 278-7339
Telecopier: (517) 278-6973

MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

DISCUSSION

Page 1 of 2

This firm has been retained to prepare this Petition for Rulemaking for Bethesda Christian Broadcasting, Inc. (Bethesda) in support of a proposal to upgrade the facilities of KLMP, Rapid City, SD. Bethesda desires to upgrade the licensed operation of KLMP from Class C1 to Class C. To accomplish this, the KLMP transmitter site would be moved to the top of Terry Peak at coordinates NL 44°19'42" by WL 103°50'03", which becomes the reference point for this proposal, continue to operate with 100 kW effective radiated power (ERP), and increase height above average terrain (HAAT) from the present 119 meters to 579 meters, nearly full Class C facilities.

Figure 1 is a tabulation of the allocation spacings from the proposed reference point with the changes proposed below to eliminate current short-spacings. Figure 2 is a portion of a topographical map showing the location of the reference point on Terry Peak. There are several broadcast facilities presently operating from the location. Therefore, power is available for KLMP operating at this location. KLMP would proposed to diplex its operation into the antenna of KSLT, Spearfish, SD. KSLT has an application pending before the FCC to upgrade facilities. Figure 3 is a map demonstrating, that from the proposed reference coordinates, KLMP would be able to provide 3.16 mV/m, city grade service, to all of the Rapid City city limits. The facilities shown are for 100 kW ERP at 579 meters HAAT. This is the operation that KLMP would provide from the Terry Peak location, at the time the upgrade is accomplished.

The reference site is presently short-spaced to one existing allocation and one proposed alternate channel in another rulemaking procedure. Channel 249A has been allotted for use at Gillette, WY with the reference coordinates specified at NL 44°17'36" by WL 105°30'06". A filing window was opened on August 11, 1997 for the channel. Three (3) mutually exclusive applicants filed for the facility. The applicants filed for three different transmitter site locations. Applicant #1, Kevin Clements, applied at NL 44°18'10" by WL 105°27'00". Applicant #2, Ron Franscell, applied at NL 44°14'53" by WL 105°29'40". Applicant #3, Redwood Broadcasting, Inc., applied at NL 44°14'35" by WL 105°32'19". It is proposed to substitute Channel 282A, 104.3 MHz, for Channel 249A at Gillette, WY. This channel, as demonstrated in Figure 4 through 4C, will work at the reference coordinates as well as all three applications sites. By making this change, it would eliminate the short-spacing to the proposal for KLMP as a Class C facility.

DISCUSSION

Page 2 of 2

In similar fashion, Mt. Rushmore Broadcasting, Inc. has proposed Channel 251A as an alternative to Channel 268A at Wright, WY. The reference coordinates for this proposal are NL 43°44'49" by WL 105°28'12". It is proposed to substitute Channel 258A, 99.5 MHz, for the alternative Channel 251A. Channel 258A meets all the spacings from the Wright, WY reference coordinates as shown in Figure 5. By making this changes, it would eliminate the short-spacing to the proposal for KLMP as a Class C facility.

This proposal requests the FM Table of Allotments, found in 47 C.F.R. §73.202(b) to be amended as follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Rapid City, SD	222C, 230C1, <u>250C1</u> , 254C1, 262C1, 281C1, 292C	222C, 230C1, <u>250C</u> , 254C1, 262C1, 281C1, 292C
Gillette, WY	245C1, <u>249A</u> , 264C1	245C1, 264C1, <u>282A</u>
Wright, WY	---	<u>258A</u>

MUNN-REESE, INC.

Broadcast Engineering Consultants
Coldwater, MI 49036

Munn-Reese Inc.
PO Box 220 - Coldwater MI 49036

Figure 1 - Proposed KLMP Upgrade
Rapid City SD

REFERENCE		DISPLAY DATES
44 19 42 N	CLASS = C	DATA 06-10-99
103 50 03 W	Current Spacings	SEARCH 06-15-99

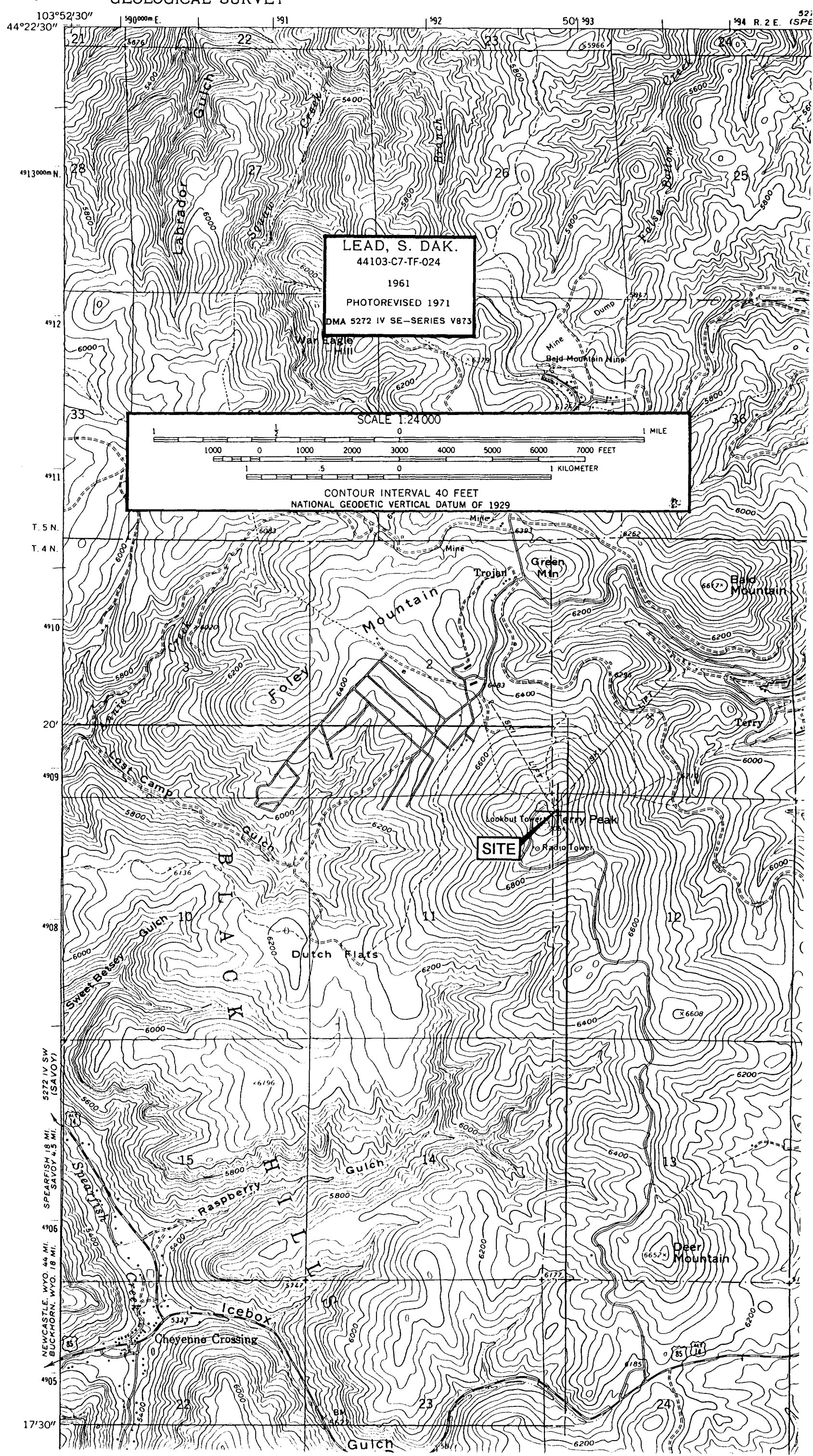
----- Channel 250 - 97.9 MHz -----

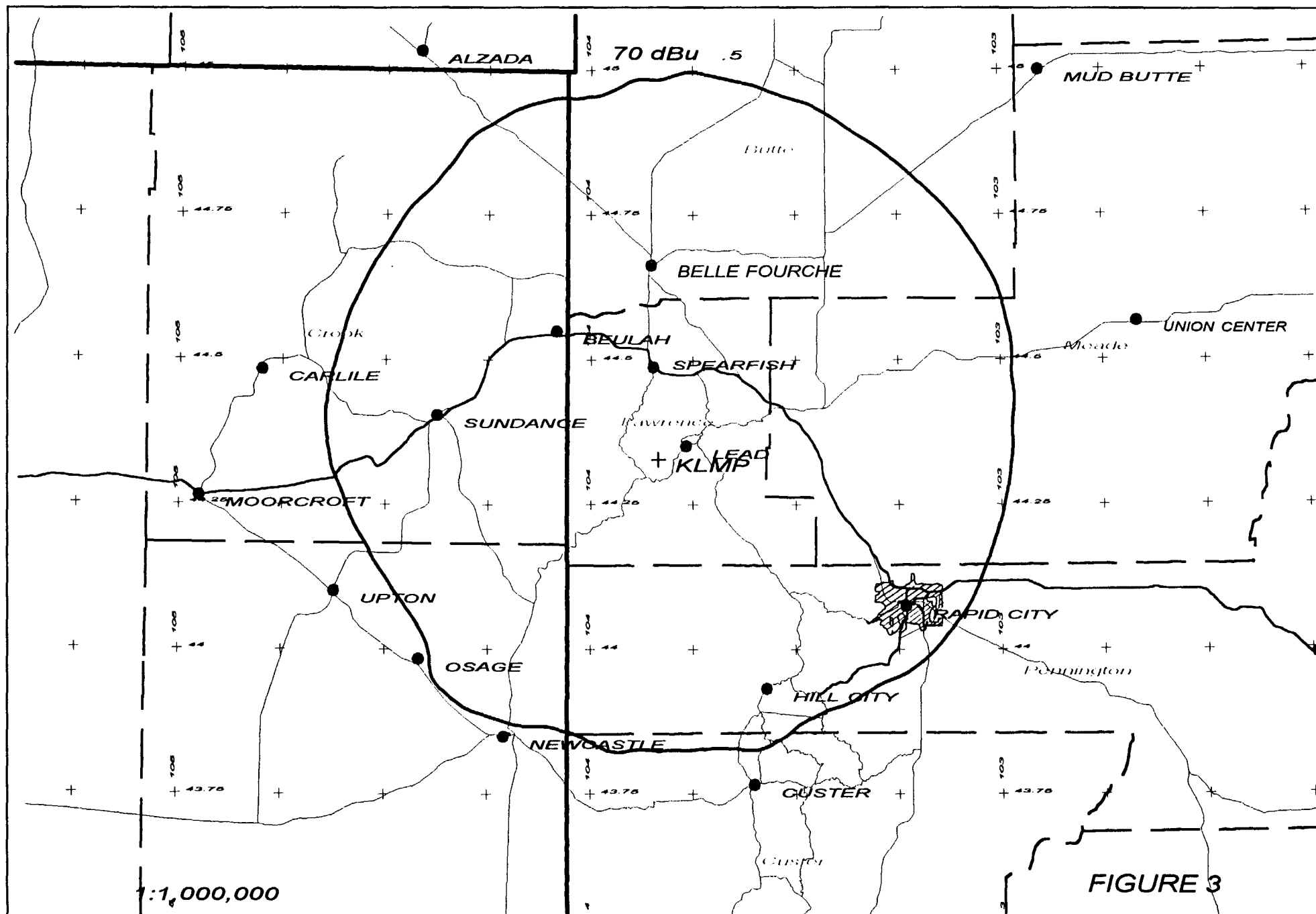
Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AD250	AL 250C	RAPID CITY	SD	0.00	0.0	290.0 -290.00
44 19 42	103 50 03	N	0.000 kW	0 M		
	Bethesda Christian Broadcasti				990616	
KLMP	LI 250C1	Rapid City	SD	56.61	123.5	270.0 -213.39
44 02 46	103 14 41	HN	100.000 kW	119 M		
	Bethesda Christian Broadcasti		BLH6472		961223	
KQSK	LI 248C1	Chadron	NE	197.20	162.4	105.0 92.20
42 38 06	103 06 12	CN	100.000 kW	256 M		
	Eagle Communications of Nebra		BLH790910AA		970627	

FIGURE 2

5272 IV NW
(MAURICE)

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY





KLMP 250C 100kW 2290M AMSL
N. Lat. 44 19 42 W. Lng. 103 50 03

KLMP, Rapid City, SD
Munn-Reese Inc - 06/99

Munn-Reese Inc.
PO Box 220 - Coldwater MI 49036

Figure 4 - Alternate Channel for
Allocation Reference Point - Gillette WY

REFERENCE							DISPLAY DATES
44 17 36 N				CLASS = A			DATA 06-10-99
105 30 06 W				Current Spacings			SEARCH 06-16-99
----- Channel 282 - 104.3 MHz -----							

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			

AD282 AL	282A	GILLETTE WY	0.00	0.0	115.0	-115.00
44 17 36	105 30 06	N 0.000 kW		0 M		
Bethesda Christian Broadcasti				990616		
ALOPEN AL	228A	Moorcroft WY	44.02	93.9	10.0	34.02
44 15 54	104 57 06	N 0.000 kW		0 M		
97-127				980413		
A Filing Window for this Channel will be Opened by the Commission in a Subsequent Order.						
Effective 4-13-98 per D97-127						
KIQK LI	281C1	Rapid City SD	181.91	98.8	133.0	48.91
44 01 19	103 15 33	CN 100.000 kW		164 M		
Tom-Tom Communications, Inc.			BLH940826KA	950324		

Figure 4A - Alternate Channel for
Kevin Clements Application Site - Gillette WY

REFERENCE		DISPLAY DATES
44 18 10 N	CLASS = A	DATA 06-10-99
105 27 00 W	Current Spacings	SEARCH 06-16-99
----- Channel 282 - 104.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AD282 AL	282A	GILLETTE WY	4.25	255.7	115.0	-110.75
44 17 36	105 30 06	N 0.000 kW	0 M			
				990616		
Bethesda Christian Broadcasti						
ALOPEN AL	228A	Moorcroft WY	40.00	95.9	10.0	30.00
44 15 54	104 57 06	N 0.000 kW	0 M			
97-127				980413		
A Filing Window for this Channel will be Opened by the Commission in a Subsequent Order.						
Effective 4-13-98 per D97-127						
KIQK LI	281C1	Rapid City SD	178.00	99.4	133.0	45.00
44 01 19	103 15 33	CN 100.000 kW	164 M			
Tom-Tom Communications, Inc.			BLH940826KA	950324		

Figure 4B - Alternate Channel for
Ron Franscell Application Site - Gillette WY

REFERENCE		DISPLAY DATES
44 14 53 N	CLASS = A	DATA 06-10-99
105 29 40 W	Current Spacings	SEARCH 06-16-99
----- Channel 282 - 104.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AD282 AL 282A	GILLETTE	WY	5.06	353.5	115.0	-109.94
44 17 36	105 30 06	N 0.000 kW	0 M			
Bethesda Christian Broadcasti				990616		
ALOPEN AL 228A	Moorcroft	WY	43.39	87.3	10.0	33.39
44 15 54	104 57 06	N 0.000 kW	0 M			
97-127				980413		
A Filing Window for this Channel will be Opened by the Commission in a Subsequent Order.						
Effective 4-13-98 per D97-127						
KIQK LI 281C1	Rapid City	SD	180.64	97.2	133.0	47.64
44 01 19	103 15 33	CN 100.000 kW	164 M			
Tom-Tom Communications, Inc.			BLH940826KA	950324		

Figure 4C - Alternate Channel for Redwood
Broadcasting Inc. Application Site - Gillette WY

REFERENCE		CLASS = A	DISPLAY DATES
44 14 35 N			DATA 06-10-99
105 32 19 W		Current Spacings	SEARCH 06-16-99
----- Channel 282 - 104.3 MHz -----			

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AD282	AL 282A	GILLETTE	WY	6.32	27.7	115.0 -108.68
44 17 36	105 30 06	N	0.000 kW	0 M		
	Bethesda Christian Broadcasti				990616	
ALOPEN	AL 228A	Moorcroft	WY	46.94	86.8	10.0 36.94
44 15 54	104 57 06	N	0.000 kW	0 M		
	97-127				980413	
A Filing Window for this Channel will be Opened by the Commission in a Subsequent Order.						
Effective 4-13-98 per D97-127						
KIQK	LI 281C1	Rapid City	SD	184.07	96.9	133.0 51.07
44 01 19	103 15 33	CN	100.000 kW	164 M		
	Tom-Tom Communications, Inc.		BLH940826KA	950324		

Figure 5 - Alternate Channel for Mt. Rushmore
Broadcasting Inc. Reference Site - Wright WY

REFERENCE		CLASS = A	DISPLAY DATES
43 44 49 N			DATA 06-10-99
105 28 12 W		Current Spacings	SEARCH 06-16-99
----- Channel 258 - 99.5 MHz -----			

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AD258 AL	258A	WRIGHT	0.00	0.0	115.0	-115.00
43 44 49	105 28 12	N	0.000 kW	0 M		
Bethesda Christian Broadcasti						
AD259 AD	259A	Pine Haven	86.05	37.6	72.0	14.05
44 21 28	104 48 36		0.000 kW	0 M		
Mount Rushmore Broadcasting,						
Alternate Channels						
ALOPEN AL	257A	Newcastle	102.62	82.8	72.0	30.62
43 51 17	104 12 13	N	0.000 kW	0 M		
14185 WO= 971006 971007						
Applications filed during the fining window must specify Class C1 facilities						
EFFECTIVE 9-10-62.						
AP257 AP	257A	Newcastle	103.66	82.3	72.0	31.66
43 51 54	104 11 32	CN	6.000 kW	100 M		
Mount Rushmore Broadcasting,						
Received after close of window.						
AP257 AP	257A	Newcastle	105.08	81.3	72.0	33.08
43 52 58	104 10 39	CN	0.200 kW	91 M		
Michael Radio Group						
KUUY.C CPM	261C1	Glendo	110.35	169.5	75.0	35.35
42 46 13	105 13 21	CN	55.000 kW	139 M		
Michael Radio Group						
*From Channel 261A per one-step application						
KKTYFM LI	257A	Douglas	113.27	182.5	72.0	41.27
42 43 42	105 31 46	CN	0.810 kW	162 M		
Douglas Broadcasting, Inc.						
CP205 CP	205A	Gillette	51.39	0.2	10.0	41.39
44 12 34	105 28 04	CN	0.430 kW	134 M		
Montana State University-Bill						
AD255 AD	255C1	Manville	127.88	147.0	75.0	52.88
42 46 45	104 37 02		0.000 kW	0 M		
Mountain West Broadcasting						